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March 30, 2007

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## BY E-MAIL & HAND DELIVERY

The Honorable Vincent J. Poppiti BLANK ROME LLP Chase Manhattan Center 1201 Market Street, Suite 800 Wilmington, DE 19801

Re: LG Philips LCD Co., Ltd v. ViewSonic Corp., et al., C.A. No. 04-343-JJF

Dear Special Master Poppiti:

In anticipation of the next status conference with Your Honor on Friday, April 13 at 11:30 a.m., Tatung and ViewSonic wish to raise a simple issue discussed this week with Delaware counsel for LPL. As Your Honor is aware, third-party discovery has been extended to May 11, 2007. The current deadline for identifying prior art through interrogatory answers is today. Defendants already have identified all of the prior art currently in their possession and have offered to make those products available for inspection by LPL. However, it is very possible that defendants will receive or become aware of additional prior art which may be relevant to this case. Mr. Heisman and I proposed to Mr. Kirk this week that the deadline for supplementation of discovery relating to prior art and invalidity be extended until May 30, 2007. While we believe defendants have the right under the Federal Rules to supplement when additional material becomes available to them, we did not want to let today's deadline pass and have LPL argue that additional discovery uncovered between now and May 11 could not be used by defendants in their invalidity defenses. Such an argument would have no merit in any event because the parties agreed that third party discovery (including discovery issued by the Defendants to third parties regarding prior art) would be globally extended to May 11, 2007.

Of course, if Mr. Kirk agrees, we can file a stipulation before the April 13 hearing.

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Respectfully,

Frederick L. Cottrell, III (#2555)

~ Later

## FLC,III/afg

cc: Clerk of the Court (By Electronic Filing)
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